

MEMO ENDORSED

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

TIANHAI LACE USA, INC.,
a New York corporation,

Plaintiff,

v.

LORD & TAYLOR LLC, *a Delaware corporation,* The Levy Group, Inc. d/b/a Betsey Johnson, *a New York corporation,* and DOES 1-10,

Defendants.

Civil Action No. 19-cv-06016

Hon. Edgardo Ramos

NOTICE OF MOTION FOR A TEMPORARY STAY OF DISCOVERY

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Defendant The Levy Group, Inc. (the “Levy Group”), hereby moves this Court, before the Honorable Edgardo Ramos, United States District Court, 40 Foley Square, New York, New York, for an Order staying discovery by ninety (90) days, as described in the Memorandum of Law.

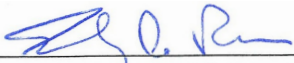
Dated: May 1, 2020

THE LEVY GROUP, INC.

By: /s Theodore Sabety
Sabety + Associates, PLLC
733 Third Avenue, 16th Floor
New York, New York 10017
212 481 8686 ph
646.349.2782 fax
ted@sabety.net

*Attorneys for defendant, The Levy Group,
Inc.*

The motion is DENIED. The parties are directed to submit a Civil Case Discovery Plan and Scheduling Order to which they believe they can adhere, given the current public health crisis and guidance from the relevant authorities. The Court will consider extension requests as the circumstances warrant. The parties are directed to submit the proposed Order by Friday, May 8, 2020. If the Court does not receive such a proposed Order or a letter detailing any dispute between the parties over such an Order, the Court will enter the Order attached to the defendant's motion as Exhibit A.



Edgardo Ramos, U.S.D.J

Dated: May. 05, 2020

New York, New York

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on May 1, 2020 he served a copy of the foregoing document on all attorneys of record by causing them to be issued through the Court's Electronic Case Filing System.

/s Theodore Sabety

Theodore Sabety